

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION**

EARL PARRIS, JR., individually,
and on behalf of a class of persons
similarly situated,

Plaintiff,

CITY OF SUMMERVILLE,
GEORGIA,

Intervenor-Plaintiff,

V.

3M COMPANY, *et al.*,

Defendants.

Case No. 4:21-cv-00040-TWT

**JOINT MOTION FOR EXTENSION OF TIME
TO SUBMIT PROPOSED BRIEFING ORDER**

The undersigned parties respectfully request an extension of time through and including October 4, 2022, to submit a Proposed Briefing Order regarding class certification, summary judgment, and Daubert motions in the above-referenced case. The undersigned parties state as follows in support of this Motion:

1. Under the scheduling order entered on May 24, 2022, the deadline for the parties to confer and submit a Proposed Briefing Order (or competing

proposals if no agreement) regarding the number of briefs, page limitations, and related issues for Class Certification, Summary Judgment, and Daubert Motions is September 20, 2022. (*See* ECF No. 187 at 5.) That deadline has not yet passed.

2. The parties respectfully request a two-week extension of time to submit the Proposed Briefing Order, through and including October 4, 2022, to give them additional time to negotiate a proposed order.

3. This extension will not impact any other case deadlines.

4. The parties are requesting this extension in good faith and not for the purposes of delay.

5. For the Court's convenience, a proposed order is attached hereto as

Exhibit A.

For the foregoing reasons, the undersigned parties respectfully request that the Court grant this motion and extend the deadline for the parties to submit the Proposed Briefing Order through and including October 4, 2022.

Respectfully submitted,

[Signatures on following pages]

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CERTIFICATION UNDER L.R. 7.1.D

Pursuant to Northern District of Georgia Civil Local Rule 7.1.D, the undersigned counsel certifies that the foregoing document was prepared in Times New Roman 14-point font, in compliance with Local Rule 5.1.C.

/s/ Robert B. Remar

Robert B. Remar

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing JOINT MOTION FOR EXTENSION OF TIME TO SUBMIT PROPOSED BRIEFING ORDER was electronically filed with the Clerk of Court using the CM/ECF system, which automatically serves notification of such filing to all counsel of record.

This 16th day of September, 2022.

/s/ Robert B Remar

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